

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Jose Gerardo Amaro Jr.

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 25, 2021 in the county of Webb in the

Southern District of Texas, the defendant(s) violated:

Code Section

Title 18 United States Code,  
Section 922 (a)(6)

Offense Description

Knowingly Make False Statements in Connection with the Purchase of a  
Firearm

This criminal complaint is based on these facts:

See Attached Sheet...

☒ Continued on the attached sheet.

/s/ Darren Johnson

Complainant's signature

Submitted by reliable electronic  
means per Fed.R.Crim.P. 4.1, Darren Johnson  
sworn to and signature attested  
telephonically on August 30, 2021,  
at Laredo, Texas.

Diana Song Quiroga  
DIANA SONG QUIROGA  
UNITED STATES MAGISTRATE JUDGE

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**ATTACHMENT A**  
**(JOSE GERARDO AMARO JR.)**

On or about July 22, 2021, a Webb County Sheriff Office (WCSO) Deputy were dispatched to a ranch located near the intersection of Hernandez and Las Pilas Roads in Webb County, Texas for a report of stolen firearms. The Deputy spoke to Jose Gerardo AMARO Jr. (hereinafter AMARO) who reported approximately ten AK-47 type rifles and twenty AR-15 type rifles stolen from a travel trailer inside the ranch.

On or about August 4, 2021 a WCSO Investigator contacted the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) to assist with the investigation.

Subsequently to August 4, 2021, ATF obtained and reviewed Firearm Transaction Records (ATF Forms 4473) for several persons including AMARO. The investigation revealed that AMARO purchased three firearms after he made the firearm theft report. Those firearms purchased at one Federal Firearm Licensee (FFL) in Laredo Texas, on three different dates of purchase as listed below:

- SIG SAUER, M400 Snakebite, 5.56 NATO rifle, bearing serial number 20L129963 (hereinafter SIG SAUER) on 07/23/2021.
- ZRODELTA, Range Ready, .223 caliber rifle, bearing serial number ZAR04218 (hereinafter ZRODELTA) on 07/26/2021.
- OCCAM DEFENSE, ODS-1775, 7.62x39 caliber rifle, bearing serial number OD-00069 (hereinafter OCCAM DEFENSE) on 07/29/2021.

AMARO certified on each ATF Form 4473 that his residential address was on Peach Tree Lane, Laredo, Texas at the time of each purchase, which remains the residential address printed on his Texas Driver's License. On August 25, 2021, ATF agents learned from AMARO's parent, who lives at the Peach Tree Lane address, that AMARO has not lived at that address for approximately two years. On the same evening, another relative who resides at the 1100 block of Quail Hollow Loop (QUAIL HOLLOW) in Laredo, Texas advised agents that AMARO has been living with that relative at the QUAIL HOLLOW address for at least one year.

ATF agents interviewed AMARO at the QUAIL HOLLOW address and the ATF Laredo Field Office. After advisement of rights and waiver, at both locations, AMARO admitted that he made several false statements on the ATF Forms 4473 in connection with the purchase of each of the three firearms listed above: 1) he certified on the forms that he resided at the Peach Tree Lane address when in fact he resided at Quail Hollow address; 2) he certified on the forms that he was the actual/transferee of each of the firearms, when in fact he was purchasing them for his relative, JESUS GUADALUPE COVARRUBIAS, (COVARRUBIAS) whom he knew was a previously convicted felon at the time of each firearm's purchase. AMARO admitted that COVARRUBIAS provided him a credit card in AMARO's name which AMARO used to make the purchases, and AMARO personally delivered each firearm to COVARRUBIAS's home.

Four additional persons were also arrested on firearm charges stemming from the investigation on whom criminal complaints are being contemporaneously filed:

**Roberto Carlos Zamora**

**Jesus Guadalupe Covarrubias**

**Alejandro Rene Sanchez**

**Felipe Jesus Melendez-Bravo**